BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POST. TE COMMISSION

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS VAN-TY-SMITH TO INTERROGATORY OF THE ASSOCIATION OF
POSTAL COMMERCE
(POSTCOM/USPS-T-13-2)

The United States Postal Service hereby provides the response of witness Van-Ty-Smith to the following interrogatory of Association of Postal Commerce: PostCom/USPS-T-13-2, filed on October 10, 2001. Interrogatory PostCom/USPS-T-13-1, originally directed to witness Van-Ty-Smith, has been redirected to witness Shaw for response.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Frank R. Heselton

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–4823; Fax –5402 October 24, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO POSTCOM INTERROGATORIES

<u>POSTCOM/USPS-T13-2</u>. If IOCS contains a field indicating whether a flat being handled is barcoded or not, please provide the following Base Year information in an electronic spreadsheet format:

- (a) Number of direct flat-handling tallies by cost pool, MODS code, mail class and mail subclass for barcoded flats
- (b) Number of direct flat-handling tallies by cost pool, MODS code, mail class and mail subclass for nonbarcoded flats
- (c) IOCS tally cost by cost pool, MODS code, mail class, and mail subclass for barcoded flats
- (d) IOCS tally cost by cost pool, MODS code, mail class, and mail subclass for nonbarcoded flats

Response to POSTCOM/USPS-T13-2

(a)-(d). The requested data are contained in an Excel spreadsheet filed in USPS-LR-J-150. The barcoded category for tallies for flats is based on IOCS Field F9608=A,B and the non-barcoded category, on IOCS Field F9608=C. The tally cost is based on IOCS Field F9250.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Dated: 24, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Frănk R. Heselton

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 October 24, 2001